

ATTACHMENT C

1. Actual Cash Value.
2. Total Loss Documentation.
3. Copies of payment log for damages.
4. Photographs of insured vehicle.
5. Photographs of the scene of the collision
6. Police Report.
7. Certified copy of the Plaintiff's automobile insurance policy. (Plaintiff will supplement)
8. Any discovery served by the Plaintiff and the Defendants' responses thereto.
9. Any document or thing identified by the Defendant.
10. Certified Copy of Defendant's citation. - Plaintiff will supplement
11. Any document attached to and identified in any depositions taken before trial.
12. Any and all pleadings filed in this case
13. Any document necessary for purposes of impeachment, cross-examination or rebuttal.
14. Any documents listed by Defendants in discovery or this Initial Disclosure.

Plaintiff reserve the right to amend this list of documentary and physical evidence upon giving reasonable notice prior to trial. Plaintiffs reserve the right to object to the authenticity and admissibility of Defendants' documents.

Any documents or tangible evidence identified or possessed by any person identified in Section A or B who is in possession of documents which may shed light on the issues of liability or damages. This information is not now in the possession of Plaintiff's counsel but will be provided to the Defendant once it is received provided it is not otherwise privileged and/or non-discoverable pursuant to applicable federal rules.

Any other documentation which is not now known but which is identified as discovery progresses. Such documentation may include information concerning the service to Defendant's vehicle; repairs to Defendant's vehicle, service and/or repairs to Defendant's vehicle prior to the incident in question, as well as documentation concerning the Plaintiff's claims concerning liability and damages.